Meredith Laws Cc: Jennifer Gaines

Subject: Fw: 2nd generation rodenticides in consumer packaging

12/18/2009 12:53 PM

This is what I sent him. Yes, it is a (difenacoum) label that has PCO, Ag and consumer sublabels. But the approval letter clearly states that the registration will be cancelled after June 2011. I did not tell him that he could have a consumer sublabel with an AG/PCO label(s) under the new mitigation. I guess it would be OK to have the sublabels if the all three limited the sale of the product in 1lb. packages or less. But that doesn't make sense for PCO/Ag product. Let me know if you still have some questions about this.

Sorry for the confusion....

## John

---- Forwarded by John Hebert/DC/USEPA/US on 12/18/2009 12:46 PM -----

From: John Hebert/DC/USEPA/US To: "Jim Barron" <jbarron@exponent.com>

Date: 05/29/2009 10:15 AM

Subject: Re: 2nd generation rodenticides in consumer packaging

Jim - That's exactly right. Everything is spelled out in the attached approval letter for that label.

John



▼ "Jim Barron" ---05/29/2009 10:05:54 AM---John, Thanks again for this label. But I did not think that this active let alone any of the other 2

From: "Jim Barron" <ibarron@exponent.com> To: John Hebert/DC/USEPA/US@EPA Date: 05/29/2009 10:05 AM

Subject: 2nd generation rodenticides in consumer packaging

John.

Thanks again for this label. But I did not think that this active let alone any of the other 2nd generation rodenticide actives would be allowed any longer in a consumer sized product. Is this an interim label good only until June 2011?

Thanks for your response.

.Tim

Jim Barron, Ph. D.
Managing Regulatory Consultant
Exponente, Inc.
1150 Connecticut Ave. NW
Suite 1100
Washington, DC 20036

Telephone (202) 701-7325 Alternate Telephone (919) 462-9860 Facsimile (202) 772-4979 Email Address jbarron@exponent.com

----Original Message---From: Hebert.John@epamail.epa.gov [mailto:Hebert.John@epamail.epa.gov]
Sent: Thursday, May 28, 2009 4:38 PM
To: Jim Barron
Subject: Re: split label example

Jim - see attached. Let me know if you have any questions.

john

(See attached file: [Untitled].pdf)

From: "Jim Barron" <jbarron@exponent.com>

To: John Hebert/DC/USEPA/US@EPA

Date: PM 05/28/2009 04:03

Subject: split label example

John,

Thanks for the phone discussion today about split labels for the rodenticides. I appreciate your agreeing to send me a recent example, as I have several to set up this way.

Jim Barron, Ph. D.
Managing Regulatory Consultant
Exponente, Inc.
1150 Connecticut Ave. NW
Suite 1100
Washington, DC 20036.

Telephone (202) 701-7325 Alternate Telephone (919) 462-9860

Facsimile (202) 772-4979) Email Address jbarron@exponent.com